REMARKS

The above proposed amendment is provided in order to facilitate a productive interview. Applicants believe that an interview would be productive in view of the significant differences between the invention as now claimed in this proposed amendment and the prior art relied upon in the first office action. Moreover, many of the concepts set forth in this application are defined by unique terminology where the applicants have acted as their own lexicographer. Many of the terms are not well understood. The interview including applicant's demonstration of the invention would hopefully clarify the meaning of terms critical to the invention. Those terms include the concepts for "churn", "tasking horizon", "verb" and "risk factor." Finally, applicant's believe that an interview that includes a discussion of the proposed claims will clearly demonstrate the differences between the present invention and the Duncan reference. Applicant's submit that such differences are dramatic and will clearly place the present invention in condition for allowability.

The undersigned also wishes to thank Examiner Thompson for his prompt assistance in forwarding pages of the cited references that were missing with applicants' copy of the Office Action.

The drawings and claims were objected to for various informalities. In response, the specification has been amended where proposed by the Office to correct the obvious grammatical and/or typographical errors. As regards Figure 8, identifying numerals 52 through 81 have already been referenced in the specification on page 17, with the exception of numeral 72, which now properly identifies the "progress" function on page

17, line 21 of the disclosure. In addition, numeral "82" in the specification has now been replaced with the correct numeral "81" to properly identify the "end" function identified in Figure 8. Numeral "108" has also been previously identified on page 21, line 15 of the specification.

Claims 1-10 were pending in the application. Claims 5 and 6 have now been canceled, and claims 1, 7, 8, 9 and 10 have been amended. Support for the amendments can be found throughout the specification and in particular on page 16, lines 1-13. In addition, new claims 11-23 have been added and are directed to additional embodiments of the invention. Claims 16 and 21 are written in independent format and encompass broader embodiments of the invention. Claim 23 is similar to old claim 1 with additional limitations added concerning the risk factors. Support for the new dependent claims may be found in the specification, *inter alia*, as follows: claim 11: p. 21, lines 12-13; claim 12: p. 18, lines 12-14; claim 13: p. 16, lines 16-17; claim 14: p. 16, lines 16-17, claim 15, page 12 lines 11-14 and p. 19, lines 7-10; claim 16: p. 12, lines 11-14; claim 18: p. 18, starting at line 25; p. 21, line 10; claim 19: p. 12, lines 11-14; claim 20: p.16, lines 16-17; claim 21: p. 20, starting at line 23.

Claims 1-10 stand rejected under 35 U.S.C. §102(b) as being anticipated by Duncan, "A Guide to the Project Management Body of Knowledge." This rejection is respectfully traversed for the following reasons.

The present invention is directed to a method and apparatus that can be effectively utilized for task planning and development. Applicants' system tracks to the planned start and stop dates and/or the actual start and stop dates for a particular task in relation to the tasking horizon window. These differences are classified as the "churn" values for the task. The system also allows one or more inputs or verbs to be associated with any churn measurement. These verbs describe the reason(s) for the churn. The verbs may then be analyzed to provide the system with individualized risk factors that can in turn be used to reduce churn and improve task efficiency.

Duncan, on other hand, relates on a very broad scale to managing an organization and its individuals. The author discusses inputs to organizational planning in highly generalized, theoretical terms. These inputs include such considerations as project interfacing, staffing requirements and constraints. Duncan provides little detail or guidance in actually designing and implementing a functional feedback system which can used to decrease task inefficiency.

Duncan also fails to teach or suggest an apparatus and method for proactively creating a task horizon which represents a window of time in which tasks are expected to be finished. The definition relied on in the office action does not address the fact that a task horizon is described as being a window of time (see page 11, lines 23-26). Further, there is no teaching or suggestion in Duncan of a system that calculates anything similar to a negative churn or as a positive churn and that this calculation is related to the movement of dates (whether they be actual or estimated) relative to the tasking horizon.

Moreover, Duncan does not disclose a system in which a risk factor can be represent or be assigned to the task as a result of analyzing the reasons for the churn. Duncan also does not provide any guidance on ultimately reducing churn, and thereby improving efficiency using the novel planning system and method as applicants have described. Overall, Duncan fails to consider how to create negative or positive churn, how to calculate churn in the manner claimed by the applicants, how to associate a risk factor to a task and how a task-based risk factor is used to explain churn. While Duncan may broadly relate to various general ideas about management, the author does not suggest the detailed method and apparatus set forth in the proposed claims.

For at least the foregoing reasons, Duncan fails to anticipate or make obvious the presently claimed invention. Withdrawal of the rejection under 35 U.S.C. §102(b) is therefore respectfully urged.

The application is believed to be in condition for allowance, and prompt, favorable action thereon is earnestly solicited.

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Respectfully submitted,

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